

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA**

In re:

Jointly Administered

EPIC Companies Midwest, LLC,
EPIC Companies Midwest 2023, LLC,
EPIC Employee, LLC,
EOLA Capital, LLC, and
EC West Fargo, LLC,

Bankruptcy No. 24-30281
Bankruptcy No. 24-30282
Bankruptcy No. 24-30283
Bankruptcy No. 24-30284
Bankruptcy No. 24-30285

Debtors.

Chapter 11

MOTION FOR LEAVE TO APPEAR BY VIDEO CONFERENCE OR TELEPHONE

1. Lighthouse Management Group, Inc. (the “Liquidating Trustee”), as trustee of the EPIC Liquidating Trust (the “Liquidating Trust”), on behalf of EPIC Companies Midwest, LLC, EPIC Companies Midwest 2023, LLC, EPIC Employee, LLC, EOLA Capital, LLC, and EC West Fargo, LLC (collectively, the “Debtors”), hereby files this motion (the “Motion”) requesting that this Court grant Steven R. Kinsella, Katherine A. Nixon, and Patrick Finn leave pursuant to Local Rules 5001-1 and 5001-2 to appear either by video conference or telephone at the hearing on the Liquidating Trustee’s claim objections (ECF Nos. 500–04) scheduled for Tuesday, February 3, 2026, at 10:30 a.m. (the “Hearing”). (ECF Nos. 505–09.)

2. Mr. Kinsella and Ms. Nixon serve as counsel for the Liquidating Trustee and Mr. Finn is a partner of the Liquidating Trustee. Allowing counsel and Mr. Finn to participate in the Hearing by video conference or telephone would minimize the time and cost associated with traveling to the Hearing. Counsel and Mr. Finn are located in Minneapolis, Minnesota.

3. As described in the *Status Report* filed by the Liquidating Trustee (ECF No. 534), nearly all informal responses to the claim objections have been resolved, except for AMEX TRS Co., Inc. The Liquidating Trustee agreed that AMEX TRS Co., Inc. could have additional time to

file a formal response in the event that one becomes necessary. Similarly, nearly all formal responses to the claim objections have been resolved, except for 7 Mile Holdings, LLC. The Liquidating Trustee has not yet had discussions with 7 Mile Holdings, LLC regarding a potential resolution.

4. For all these reasons, the Liquidating Trustee is proposing to treat the Hearing as a status conference to discuss a continued hearing date for an evidentiary hearing, to the extent one is needed, as well as to allow the Liquidating Trustee additional time to negotiate a resolution to the outstanding responses.

5. Based on the foregoing, the request to attend the Hearing by video conference or telephone will not cause any undue hardship to the parties herein and would serve the interests of justice and preserve the resources of the Liquidating Trust.

WHEREFORE, the Liquidating Trustee requests entry of an Order:

A. Granting the Motion and authorizing counsel and Mr. Finn to appear by video conference or telephone at the Hearing; and

B. Granting such other and further relief as the Court deems proper.

Dated: January 27, 2026

/s/ Steven R. Kinsella

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ATTORNEYS FOR LIQUIDATING TRUSTEE